



The Commonwealth of Massachusetts

Office of Campaign & Political Finance

One Ashburton Place, Boston 02108

727-8352

Dennis J. Duffin
Director

AO-84-16

December 7, 1984

Terry Philip Segal, Esquire
Segal, Moran & McMahan
210 Commercial Street
Boston, MA 02109

Dear Mr. Segal:

You have recently requested an advisory opinion concerning the application of M.G.L. c.55, the campaign finance law, to certain activities. Specifically you have inquired whether there is any limitation on the amount a political committee organized on behalf of a candidate for state representative may contribute to a multi-candidate committee in a given calendar year.

Section 6 of Chapter 55 is concerned with contributions between political committees. It states, in relevant part;

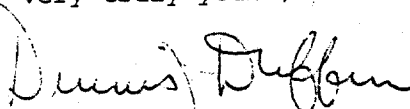
"...Any other political committee, duly organized, may receive, pay and expend money or other things of value for the enhancement of the political future of the candidate or the principle, for which the committee was organized so long as such expenditure is not primarily for the candidates or any other person's personal use..., and provided, further, that such committee may contribute to other political committees and may contribute to the campaign fund of a candidate and provided, further, that the aggregate of all such contributions made by such a committee organized on behalf of a candidate to another non-elected political committee organized on behalf of a candidate shall not exceed in any one calendar year the sum of one hundred dollars; and provided further, that the aggregate of all such contributions made by such a committee organized on behalf of a candidate to other non-elected political committees organized on behalf of candidates shall not exceed in any one calendar year the sum of fifteen hundred dollars."

The campaign finance law provides, therefore, that political committees may contribute to other political committees. It provides specific dollar limitations on contributions from political committees organized on behalf of individual candidates to other such committees organized on behalf of individual candidates. While it does not provide a specific dollar limitation on contributions from a committee organized on behalf of an individual candidate to a multi-candidate committee, you should not view the extent of that type of activity as limitless. Rather,

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a political committee organized on behalf of an individual candidate for state representative is organized for the purpose of influencing the nomination or election to public office of that particular individual. While the law permits candidates' political committees to contribute to other political committees, those expenditures must not result in a substantial portion of the funds of a candidate's political committee being used to support the nomination or election of other individuals to public office. That result would frustrate both the letter and intent of the campaign finance law.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Dennis J. Duffin".

Dennis J. Duffin
Director

DJD/bva